REMARKS

Claims 36-72 and 74 are pending in this application. Claims 1-35 have been cancelled. Claims 73, 75-79 were withdrawn form further consideration without disclaimer or prejudice. By this Response, claims 36, 63, and 74 have been amended. The amendment made to the claims are fully supported by the specification as originally filed. No new matter has been introduced. The Applicants hereby respectfully distinguish the claimed subject matter and the cited prior art. Reconsideration of this application for allowance of all pending claims are hereby respectfully requested in view of the following remarks.

Claims Rejected Under 35 U.S.C § 112, 1st Paragraph

The Examiner rejected claim 60 under 35 U.S.C. §112 for lack of antecedent with respect to the limitation "wherein the steps of dividing the content and generating an identifier". The Applicants respectfully point out that this limitation has proper antecedent. Claim 60 depends from claim 59, which further depends from claim 36, which recites both steps of "dividing the content" and "generating an identifier". Therefore, "the steps of dividing the content and generating an identifier", recited in claim 60, refers back to the corresponding steps recited in claim 36. Therefore, the Applicants respectfully request that rejection of claim 60 under 35 U.S.C. §112 be withdrawn.

Claims Rejected Under 35 U.S.C § 103(a)

Claims 36-60, 62-72 and 74 have been rejected under 35 U.S.C. §103(a) as being unpatentable over the Levin reference in view of Levin admitted prior art (APA). The Applicants respectfully traverse the rejection.

Claims 36, 63, and 74 are independent claims, all of which recite "identifying a translated component, generated previously via human translation based on a dictionary, ... generating the

translated web content based on one or more translated components, identified in the identifying step". The claimed subject matter is clearly directed to human translation based on a dictionary in the context of web content.

The Applicants respectfully submit that Levin not only does not teach "human translation" but also teaches away from "human translation" of web content. Levin stated "While human translation is unquestionably the preferred method for producing accurate and idiomatic translations, it remains prohibitively expensive and too time consuming to meet the new demands of businesses and individuals working at Internet speeds." (see paragraph 4 of Levin) Levin further indicated that his invention is not related to human translation. He stated "The present invention can employ comprehensive dictionaries and a collection of linguistic rules that translate one language into another without relying on human translators." Clearly, Levin teaches away from "human translation" of web content, which is recited in each and every independent claims in the instant application. It is widely accepted that "teaching away", as evidenced here, is an important piece of evidence for non-obviousness.

In addition, it is well settled that objective evidence or secondary consideration must be taken into account in making an obviousness type rejections. According to *MPEP 2141, III*, objective evidence includes unexpected results, commercial success, long felt need, failure of others, copy by others, licensing, and skepticism of expert, etc. Relevant here is the known principle that "expressions of disbelief … constitutes strong evidence of non-obviousness". *Environmental Designs, Ltd. V. Union Oil Co. of Cal.*, 713 F.2d 693, 698, 218 USPQ 865, 869 (Fed. Cir. 1983). Clearly, Levin expressed his skepticism about employing human translation in translating web content, which is what is claimed in claims 36, 63, and 74. Therefore, the skepticism from Levin himself provides a strong piece of evidence of non-obviousness.

The Examiner cited Levin, paragraph 46, and asserted that Levin does teach human translation because the linguist is a human. The Applicants respectfully disagree. Levin teaches to use a linguist to make <u>rules</u> that are used during machine translation. This is not the human translation activity itself. In Levin, a machine, instead of a human, is used for translation. This is different from the claimed invention, which, as discussed above, is directed to "human translation based on a dictionary", as recited in independent claims 36, 63, and 74. As commonly known, although a dictionary can be made by a linguist, making a dictionary is separate from the activity of translating a document by utilizing a dictionary. Put it another way, language translation is a different process than making a dictionary. This is clearly recited in the independent claims: dictionary is what a human uses for translating web content. In the claimed invention, besides a dictionary, a human translator additionally performs document translation, which can not be equated with dictionary making, as the Examiner asserted. That is, Levin's teaching on generating a special dictionary by a linguist can not be read to mean "human translator based on a dictionary", which is recited in all independent claims. Thus, the Applicants respectfully submit that claims 36, 63, and 74 are not obvious and patentable. As to claims 37-60, 62, 64-72, since they depend from claims 36 and 63 respectively, they are not obvious and patentable for at least the same reasons as stated above with respect to claims 36 and 63 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claims 36-60, 62-72 and 74 35 U.S.C. §103(a) be withdrawn.

Claim 61 has been rejected under 35 U.S.C. §103(a) as being unpatentable over US Publication 2004/0102956 (Levin) as applied to claims 36-51, 53-55, 57-66, 68-70, 72 and 74 above, and further in view of US Publication 2003/0187587 (Swindells et al.) filed March 14, 2007. The Applicants respectfully traverse.

The Examiner conceded that Levin does not teach a first and a second hash codes and cited Swindells et al. to remedy that deficiency. However, as discussed above, Levin does not teach "human translation" and in fact Levin teaches away from human translation. Since claim 61 depends from claim 36, which is directed to human translation, claim 61 is not obvious and patentable for at least the same reasons discussed above with respect to claim 36. Therefore, the Applicants respectfully request that rejection of claim 61 35 U.S.C. §103(a) be withdrawn.

Conclusion

The Applicants have addressed all rejections/objection raised by the Examiner. Accordingly, it is believed that all pending claims are now in condition for allowance. Applicants therefore respectfully request an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicants' representative at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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